



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

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MEMORANDUM

TO: The Commission

FROM: Christopher Hughey
Acting General Counsel

Kathleen Guith
Acting Associate General Counsel for Enforcement

BY: Mark Shonkwiler *MS*
Assistant General Counsel

Kamau Philbert *KP*
Attorney

Margaret Ritzert *MR*
Attorney

SUBJECT: MUR 6223 (St. John Properties, Inc., et al.) – Pre-Probable Cause Conciliation

Attached is a revised conciliation agreement which settles violations of 2 U.S.C. §§ 441b(a) and 441f by St. John Properties, Inc. ("SJPI") and Edward St. John, involving the use of corporate funds to reimburse SJPI's six Senior Vice Presidents for \$60,000 in contributions they made to the federal account of the Maryland Republican State Central Committee in late 2006. Attachment 1.

On April 5, 2011, the Commission _____
_____ voted to take no further action and close the file as to the six
Senior Vice Presidents whose contributions were reimbursed.

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_____, we recommend that the
Commission accept the attached conciliation agreement and close the file.

RECOMMENDATIONS:

1. Accept the attached conciliation agreement with Edward St. John and St. John Properties, Inc.
2. Approve the appropriate letters.
3. Close the file.